UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
) Cause No. 4:14CR00361CDP/NAB
vs.)
SHOICHI OKADA,)
)
)
Defendant.	

MOTION FOR LEAVE TO FILE SENTENCING MEMORANDUM UNDER SEAL AND IN EXCESS OF THE PAGE LIMITATION

Comes now the Counsel for the Defense and requests leave of the Court to file defendant's sentencing memorandum under seal and in excess of the page limitation.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD, ATTORNEYS AT LAW, P.C.

By /s/ Daniel A. Juengel

DANIEL A. JUENGEL, (#42784MO)
Attorney for Defendant
7710 Carondelet Ave., Suite 350
Clayton, Missouri 63105
(314) 725-7777

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Ms. Rob Livergood Asst. United States Attorney 111 South Tenth Street, 20th Floor St. Louis, Missouri, 63102

/s/ Daniel A. Juengel
DANIEL A. JUENGEL